

Exhibit 7

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VIA E-MAIL (EFISHER@BINDERSCHWARTZ.COM)

Eric B. Fisher
Binder & Schwartz LLP
366 Madison Avenue
Sixth Floor
New York, NY 10017

Re: Securities Investor Protection Corp. v. Bernard L. Madoff Investment Securities LLC, Adv. Pro. No. 08-01789 (SMB): Khronos LLC's October 9, 2020 Document Production

Dear Eric:

Thank you for your response of October 14, 2020 addressing the Trustee's questions concerning Khronos LLC's October 9, 2020 document production (the "Khronos Production"). We look forward to receiving additional documents concerning the transfers and SWIFT payments to and from Montpellier International Ltd. In the interest of time and completeness, we would ask that the upcoming production include sufficient information to fully and accurately identify all the transferees shown on the 157 account statements produced by Khronos (Bates Nos. KHRSA0000001-741) as well as on any additional account statements that may be produced.

As alluded to in the Trustee's October 12, 2020 letter, the Khronos Production consists of account statements lacking any specificity. For example, the statements list various transfers and SWIFT payments with descriptions such as "PO Citibank," "PO PNC Bank," "PO Deutsche Bank," "PO Dresdner," "PO Santander," "Montpellier," "TBA to 12661," to name just a few. This information alone is insufficient to identify the recipients of these transfers or satisfy Khronos's obligation to produce all documents "concerning any and all transfers to and from Montpellier International Ltd. ("Montpellier International") and Prince Assets LDC ("Prince"), and any transfers of their transferees."

Mr. Eric Fisher
October 16, 2020
Page 2

Order, ECF No. 19801. Accordingly, we ask that these documents be produced by October 23, 2020.

We also request that Khronos provide additional information concerning the transfers to Montpellier International and Prince including copies of Legacy Capital Ltd.'s Santander Bank account statements by October 23, 2020 in accordance with Judge Bernstein's Order. *See id.* (requiring production of documents transfers *to and from* Montpellier and Prince). We appreciate that you previously represented to the Court that documents were provided "that reference Montpellier International Ltd., Prince Assets LDC, and redemptions paid to them by Legacy." Fisher Decl. ¶ 7, ECF No. 19706. However, these documents do not show the details surrounding the actual transfers from Legacy Capital Ltd.'s account at Santander Bank. *See id.*, Exh. B.

Sincerely,

/s/ Jason S. Oliver

Jason S. Oliver